

REMARKS

Acknowledgement of Allowable Subject Matter

Applicant thanks the Examiner for indicating the allowability of claims 14 and 30 after they are amended to be rewritten in independent form to include the limitations of the base claim and any intervening claims. Applicant defers amending the claims to give the Examiner the opportunity to consider Applicant's remarks enclosed herein.

Rejection of Claims 1-13, 15-29, and 31-39 under 35 U.S.C. § 103 (a) as being unpatentable over US 20020051432 (Shin) in view of US 5664007 (Samadi)

Applicant respectfully traverses the rejection of claims 1-13, 15-29, and 31-39. Reconsideration is respectfully requested.

The Office Action on page 3, item 4 states "Shin fails to specifically disclose obtaining a handover number that terminates on a mobility manager associated with the first communication network.... the handover is initiated by a handover call made by the wireless communication unit on the second communication network to the handover number while the first call is ongoing." In the Office Action, it is acknowledged that Shin does not disclose these limitations but that "Samadi teaches obtaining a handover number (session ID) that terminates on a mobility manager associated with the first communication network (col. 3, line 55 to col. 4, line 44)...the handover is initiated by a handover call made by the wireless communication unit on the second communication network to the handover number while the first call is ongoing (col. 3, line 55 to col. 4, line 44)."

Applicant respectfully submits that the Samadi or the combination of Shin and Samadi does not teach or suggest all the claim limitations as set forth in independent claim 1. Specifically, independent claim 1 requires "obtaining a *handover number* that terminates on a *mobility manager* associated with the first communication network...*a handover call* made by

the wireless communication unit... *to the handover number while the first call is ongoing.*”

These specific limitations are not taught or suggested in Samadi or the combination of Shin and Samadi.

Samadi is directed to a method and apparatus for providing continuation of a communication call as a user moves from a first network to a second network. When the user on the communication call is moving to the second network, the user of a cellular phone sends a pause request signal to the first network to pause the ongoing communication call. In response to receiving the pause request, the first network transmits reconnection identification information to the cellular phone. The reconnection identification information includes a code that identifies the first network as well as a combination of signals that identify the particular session or call that is paused. The first network also “parks the call” in response to the pause request. The phrase “park a call” means that the call is held. See col. 3, line 62 to col. 4, line 5. The user upon moving to the second network, registers with the second network by dialing a standard publicly known telephone number and transmits a reconnection request signal that has reconnection identification information to the second network so as to resume the call. See col. 3, line 55 to col. 4, line 44 of Samadi.

Applicant respectfully disagrees with the statement in item 4, page 3, of the Office Action dated May 8, 2007 that Samadi discloses “a handover number.” The Office Action specifically refers to session ID as describing or being analogous to Applicant’s “handover number.” Please note that no where in Samadi mentioned the term “session ID,” however, the Office Action appears to interpret a combination of signals that identify the particular session, as the session ID. e.g., as cited in col. 4, lines 1-2 of Samadi. Regardless, this analogy is a mischaracterization of Samadi. Samadi’s combination of signals that identify the particular session is simply reconnection identification information that is sent only after making a call with the second network, and is not for the call. See col. 3, line 66 to col. 4, line 2, and col. 4, lines 18-24 of Samadi. In contrast, Applicant’s handover number is specifically used for the handover call and is therefore associated with that call. Thus, it is inappropriate to equate Applicant’s “handover number” with Samadi’s combination of signals that identify the particular session.

In addition, Applicant respectfully disagrees with the statement in item 4, page 3, of the Office Action that Samadi describes “obtaining a handover number that terminates on a mobility manager associated with the first communication network...a handover call made by the wireless communication unit... to the handover number.” The Office Action specifically refers to col. 3, line 55 to col. 4, line 44 as describing or being analogous to Applicant’s claim as reciting “a handover call made by the wireless communication unit... to the handover number.” This analogy is, however, a mischaracterization of Samadi. Samadi discloses that the user registers with the second network by making a call to a standard publicly known telephone number that terminates with the second network, and not to the obtained handover number that “terminates on a mobility manager associated with the first communication network.” See col. 4, lines 16-21, and col. 6, lines 15-18 of Samadi. This standard number is used for all devices while the handover number is specifically associated with the mobility manager and the handover call. As such, Applicant’s claim recites “obtaining a handover number that terminates on a mobility manager associated with the first communication network...a handover call made by the wireless communication unit... to the handover number.”

Further, Applicant also respectfully disagrees with the statement in item 4, page 3, of the Office Action that Samadi describes that a “handover is initiated...while the first call is ongoing.” The Office Action specifically refers to col. 3, line 55 to col. 4, line 44 as describing or being analogous to Applicant’s claim as reciting “handover is initiated...while the first call is ongoing.” The cited section of Samadi discloses that the first call is *paused or held for a predetermined time interval*, and the call is therefore *not ongoing*. See col. 3, line 62 to col. 4, line 5 of Samadi. In contrast, Applicant’s claim recites “handover is initiated...while the first call is ongoing.” Thus, the above analogy is inappropriate and a mischaracterization of Samadi.

In view of the foregoing, the combination of Shin and Samadi does not teach or suggest the above mentioned claim limitations as required by independent claim 1. Applicant therefore respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C 103.

Regarding independent claims 9 and 23, Applicant respectfully submits that the above discussed arguments apply equally to the limitations of claims 9, and 23. Applicant therefore respectfully requests withdrawal of the rejection of claims 9 and 23 under 35 U.S.C 103.

For the above reasons, Applicant submits that claims 1, 9, and 23 are not obvious in view of combination of Shin and Samadi, and therefore that the rejection of claims 1, 9, and 23 under 35 USC 103(a) should be withdrawn. Applicant requests that claims 1, 9, and 23 now be passed to allowance.

Dependent claims 2-8, 10-13, 15-22, 24-29, and 31-39 depend from, and include all the limitations of independent claims 1, 9, and 23. Therefore, Applicant respectfully requests reconsideration of dependent claims 2-8, 10-13, 15-22, 24-29, and 31-39 and requests the withdrawal of the rejection of these claims. Applicant requests that claims 2-8, 10-13, 15-22, 24-29, and 31-39 now be passed to allowance.

Rejection of Claims 8, 21-22, and 37-39 under 35 U.S.C. § 103 (a) as being unpatentable over US 20020051432 (Shin) in view of US 5664007 (Samadi) further in view of US 20020126701 (Requena)

Dependent claims 8, 21-22, and 37-39 depend from, and include all the limitations of independent claims 1, 9, and 23. Therefore, Applicant respectfully requests reconsideration of dependent claims 8, 21-22, and 37-39 and requests the withdrawal of the rejection of these claims. Applicant requests that claim 8, 21-22, and 37-39 now be passed to allowance.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees associated herewith, including extension of time fees, to **50-2117**.

Respectfully submitted,
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